UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

TERRI PECHNER-JAMES and SONIA	
FERNANDEZ,	
Plaintiffs,	
v.)	C.A. No. 03-12499-MLW
CITY OF REVERE, THOMAS AMBROSINO,	
MAYOR, CITY OF REVERE POLICE	
DEPARTMENT, TERRENCE REARDON,	
CHIEF OF POLICE, BERNARD FOSTER,	
SALVATORE SANTORO, ROY COLANNINO,)	
FREDERICK ROLAND, THOMAS DOHERTY,)	
JOHN NELSON, JAMES RUSSO, MICHAEL)	
MURPHY and STEVEN FORD,	
Defendants.	

DEFENDANT, CITY OF REVERE'S, CERTIFICATE OF COMPLIANCE RE: LOCAL RULE 7.1(a)(2) RE: MOTION FOR SANCTIONS

On May 12, 2006, prior to commencing the deposition of Plaintiff Fernandez, I met face to face with Attorney James Dilday about the motion for sanctions related to this certificate. He declined to dismiss the case of Plaintiff Terri Pechner, to agree to any of the proposed evidentiary sanctions as an alternative to dismissal, to pay the requested sanctions or a reduced amount thereof, or to agree to the requested protective order. He did agree that the Defendants represented by the undersigned would be entitled to an additional one half day of deposition time.

[Signature on next page.]

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For the Defendant, CITY OF REVERE,

By its Attorneys,

<u>/s/ Walter H. Porr, Jr.</u> Paul Capizzi, Esq., City Solicitor BBO#: 646296 pcapizzi@rvere.org Walter H. Porr, Jr., Esq., Assistant City Solicitor BBO#: 659462 wporr@revere.org City Hall, 281 Broadway Revere, MA 02151

Dated: May 12, 2006.

CERTIFICATE OF SERVICE

781-286-8166

I, Walter H. Porr, Jr., Assistant City Solicitor and counsel of record for the Defendants, City of Revere and the City of Revere Police Department, hereby certify that I have electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system. I caused to be served upon counsel of record, at the address stated below, via the method indicated, a true copy of same:

James S. Dilday, Esq. Grayer & Dilday, LLP 27 School Street, Suite 400 Boston, MA 02108 Attorneys for the Plaintiffs Via CM/ECF e-mail

Michael J. Akerson, Esq. Reardon, Joyce and Akerson, P.C. 397 Grove Street Worcester, MA 01605 Attorneys for Defendants Bernard Foster, Salvatore Santoro, Roy Colannino, Frederick Roland, Thomas Doherty, John Nelson, James Russo, Michael Murphy, and Steven Ford Via CM/ECF e-mail

/s/ Walter H. Porr, Jr. Walter H. Porr, Jr.,

Dated: May 12, 2006